

February 24, 2005

The Honorable Valerie Woodruff
Secretary of Education
Department of Education
John G. Townsend Building
Dover, De. 19901

RE: DOE Proposed Unit Count Regulations [8 DE Reg. 1070 (February 1, 2005)]

Dear Secretary Woodruff,

The Developmental Disabilities Council has reviewed the DOE Proposed Unit Count Regulations of February 1, 2005. We understand that these proposed regulations will have some discrete amendments to the unit count standards. The DD Council has the following observations.

First, in Section 4.1.13, I believe the word “infraction” should be “fraction”.

Second, the regulations continue to provide a financial disincentive to “mainstream” special education students since IDEA-classified students receiving less than 12.5 hours of instruction from a special education teacher generate less favorable unit counts. See Section 4.1.12. The “12.5 rule” is an historical benchmark which would benefit from revision to remove financial disincentives to “mainstream” IDEA-classified students.

The Developmental Disabilities Council thanks you in advance for your consideration of these comments. Should you have any questions regarding the above please contact our office at 739-3333.

Sincerely,

Jamie Wolfe
Chairperson

cc. Dr. Joseph Pika, SBE
Dr. Patricia Carlson, PSB
Dr. Martha Brooks, DOE
Dr. Carol Mayhew, DOE
Susan Keene Haberstroh, DOE
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Governor's Advisory Council for Exceptional Citizens
State Council for Persons with Disabilities